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January 9, 2013

Mr. Michael Robertson, P.E.  
Program Manager  
Gas Safety and Reliability Branch  
Consumer Protection and Safety Division  
California Public Utilities Commission  
320 W. Fourth Street, Suite 500  
Los Angeles, CA 90013

Dear Mr. Robertson:

The staff of the Consumer Protection and Safety Branch (CPSD) of the California Public Utilities Commission conducted a General Order (GO) 112-E compliance inspection of Southern California Gas Company's (SoCalGas) Orange Coast Distribution Region (Region) from July 9 – 13, 2012. The audit included a review of the Region's records from the period of July 2011 to July 2012 and random inspections of pipeline facilities. CPSD staff also reviewed the Region's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

In your letter dated December 10, 2012 and received on December 12, 2012, you attach a Summary of Audit Findings, which identifies probable violations of G.O. 112-E Reference Title 49 of the Code of Federal Regulations (CFR), Part 192, and request a written response within thirty days of our receipt indicating corrective actions taken by SoCalGas. Attached, is our written response and proposed corrective actions.

SoCalGas looks forward to working with you and your staff to resolve these audit findings and any other concerns you might have. Please feel free to contact me at (213) 305-8660, if you have any questions or need additional information.

Sincerely,

W. Jeff Koskie  
Pipeline Safety and Compliance Manager

Attachments

Cc: Jerry Palo Jr., CPUC –Los Angeles  
Adriana Crasnean, CPUC – Los Angeles  
Joel Tran, CPUC-Los Angeles

Attachment 1  
Response to Audit Findings

Audit Finding

**1. Title 49 CFR §192.161 -Supports and Anchors**

*§192.161(d)1 ...A structural support may not be welded directly to the pipe.*

CPSD inspected the Raymer and Gilbert Regulator Station in Fullerton and noted that the saddle supporting the main run was welded directly to the pipe. Please provide CPSD the date when this pipeline structure was welded to the main pipeline and the measures the Region will take to address the situation.

Response

The above mentioned facility complies with applicable code provisions. Section 192.161(d), which is not fully quoted in the audit finding, requires that “[e]ach support on an exposed pipeline operated at a stress level of 50 percent or more of SMYS must comply with the following: (1) A structural support may not be welded directly to the pipe.” (emphasis added)

As demonstrated in the table below, the identified piping is operating at 5.6% SMYS, which is well below the 50% SMYS threshold set forth in §192.161(d). Thus, the cited code section does not apply.

Pipe Segment Data	
Outer Diameter (OD)	2.375 inches (2 inch nominal)
Pipe Grade	“B” – 35,000 psi
Wall Thickness	0.154 inches
MAOP (per DDS testing)	253 psig

$$\% \text{ SMYS} = (MAOP \times OD) \div (2 \times \text{Grade} \times \text{Wall Thickness}) = 5.6\%$$

Corrective Action

As the identified facility is in compliance with applicable code provisions, there is no violation and no further action is required.

## Audit Finding

### **2. Title 49 CFR §192.465 -External Corrosion Control: Monitoring**

*§192.465(a) ...However, if tests at those interval are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.*

- A. CPSD reviewed the list of isolated sections of pipeline that were inspected for cathodic protection in 2001. These same sections of pipeline were to be inspected by 2011 as required by 49 Title CFR §192.465(a). The Region could not provide records demonstrating that the isolated sections of pipeline listed in Attachment 2 were inspected by 2011. Please review Attachment 2 and provide the most recent dates and pipe-to-soil reads for each location and an explanation why there were no records indicating that these sections of pipeline were inspected by 2011. If the most recent pipe-to-soil reads of the pipeline segments listed in Attachment 2 were inadequate, please describe the corrective actions taken by the Region.
- B. CPSD also found isolated sections of pipeline that were inspected for cathodic protection in 2001 that did not have complete records indicating the same sections of pipeline were inspected in 2011. Please review Attachment 3 and provide the most recent dates and pipe-to-soil reads for each location and an explanation why the 2011 records were incomplete. If the most recent pipe-to-soil reads of the pipeline segments listed in attachment 3 were inadequate, please describe the corrective actions taken by the Region.

## Response

- A. As shown in the following table, five of the seven locations identified in CPSD's Attachment 2 were read within ten years and are compliant with 49 CFR 192.465(a). During the audit, Staff solely reviewed documentation from years 2001 and 2011. These five identified locations were inspected prior to 2011, well within the ten-year timeframe provided in section 192.465(a).

We inspected the address at 222½ 20<sup>th</sup> Street in December 2012 and found the location to be in compliance, with a read of 1.08V, well above the minimum threshold criteria of 0.85V. Historical records show that the prior reading in July 2001 was 1.14V, also well above the minimum criteria. A review of the service history data for this address indicates that a modification to the database record was made in 2005. This resulted in an unintended change to the inspection cycle for this address and a new inspection was issued by the system to perform the next CP read ten years later in 2015.

We inspected the address at 16233 Heron Avenue in December 2012 and found the location to be in compliance, with a read of 1.23V, well above the minimum threshold criteria of 0.85V. Historical records show that the prior read in May 2001 was 1.25V, also well above the minimum criteria. It is unclear why the system did not issue a CP10 read order in 2011. The normal inspection cycle has been reinstated for this address. The next scheduled inspection is 2021.

Address	Recent Read	Reason for Data Discrepancy
CP10 Facilities Inspected Prior to 2011		
1240 N. State College Blvd.	2009: 1.4V	This service is normally read every 10 years on the year ending with a "9" (i.e. 1999). During the scheduled 1999 read it was found to be out of tolerance and corrective work was initiated. The work was completed in 2001, hence the 2001 read. This service remained on its normal "9" cycle and re-read in 2009 and is due again in 2019.
531 Gardenia Ave	2010: 1.34V	This service is normally read every 10 years on the year ending with a "0" (i.e. 2000). During the scheduled 2000 read it was found to be out of tolerance and corrective work was initiated. The work was completed in 2001, hence the 2001 read. This service remained on its normal "0" cycle and re-read in 2010 and is due again in 2020.
1619 Bluebird Canyon Dr.	2006: 0.92V	This service is normally read every 10 years on the year ending with a "1" (i.e. 2001) and was read in 2001. A change in the scheduled read date transferred this service to the 2006 cycle, when it was read again. The next scheduled read is 2016.
1631 El Camino Real	2010: 1.30V	This service was read on the 2001 cycle. A change in the scheduled read date transferred this service to the 2010 cycle, when it was read again. The next scheduled read is 2020.
10 Pauma Ln	2009: 1.34V	This service was read on the 2001 cycle. A change in the scheduled read date transferred this service to the 2009 cycle, when it was read again. The next scheduled read is 2019.
CP10 Facilities Inspected in 2012		
222 1/2 20th St.	2012: 1.08V	Service History was modified in 2005 and the cycle was changed to 2015. The cause of change is unknown and documentation of a 2005 read cannot be located. The location was read in December 2012 and found to be at 1.08V, well above the minimum criteria.
16233 Heron Ave	2012: 1.23V	A CP10 read was conducted in 2001. The system did not generate a CP10 order in 2011. The location was read in July 2012, found to be at 1.23V, well above the minimum criteria. The inspection cycle has been reinstated in the system and the next inspection is due in 2021.

#### Corrective Action

The company is reviewing current procedures for service history data entry and processing to identify potential process and/or system improvements. Refresher training will be conducted to reinforce data entry procedures. In addition, an ongoing effort is underway to review and correct historical data, as needed.

B) As shown in the table below, seven of the eight locations identified in the audit report are plastic services with anodeless risers and do not require CP10 reads. They are in compliance with applicable regulations.

The address at 13875 Artesia Blvd was inspected in July 2012 and found to be in compliance, with a read of 1.4V, well above the minimum threshold criteria of 0.85V. The next inspection is due in 2022. Based on our review, it is unclear why this location was not identified for inspection prior to 2012.

Address	Recent Read	Reason for Data Discrepancy
Non CP10 Facilities		
9840 Katella Ave	n/a	This is a plastic service with anodeless riser. A data update to service history in May 2011 seems to have caused an improper CP10 order to be generated. This is not a CP10 service. This data error has been corrected.
10951 Berry Ave	n/a	This is a plastic service with anodeless riser. A data update to service history in May 2011 seems to have caused an improper CP10 order to be generated. This is not a CP10 service. This data error has been corrected.
8892 Katella Ave	n/a	This is a plastic service with anodeless riser. A data update to service history in October 2011 seems to have caused an improper CP10 order to be generated. This is not a CP10 service. This data error has been corrected.
8 Rue Chantilly	n/a	This is a plastic service with anodeless riser. A data update to service history in July 2011 seems to have caused an improper CP10 order to be generated. This is not a CP10 service. This data error has been corrected.
4861 Lakeview Ave	n/a	The MSA was removed from this service in preparation for building demolition. Work performed in October 2011 seems to have caused an improper CP10 order to be generated. This data error has been corrected. This steel service is part of CP Area 7294A and is protected by the main.
6961 Oregon Ave. (Now 8101 Orangethorpe)	2011: 1.42V	This street address no longer exists. Two adjacent properties (6961 Oregon and 8101 Orangethorpe) were combined into a single lot for the current automotive tire store. The address for the combined property was converted to 8101 Orangethorpe Ave. A CP10 reading was completed for that address in 2011. Address 8101 Orangethorpe read 1.42V in 2011.
2382 Lincoln Ave.	2011: 1.14V	This address is on a "0" cycle (i.e. 2010). The November 2010 read was 1.14V. The next read is due by 2020. It is unclear why a 2011 order was issued for this service.
CP10 Facilities Inspected in 2012		
13875 Artesia Blvd.	2012: 1.4V	This location was identified as a CP10 location mid-year 2011. The system did not generate a CP10 order for 2011, per normal procedure it would have been scheduled for inspection in 2012. Next read is due in 2022.



### Corrective Action

The company is reviewing current procedures for service history data entry and processing to identify potential process and/or system improvements. Refresher training will be conducted to reinforce data entry procedures. In addition, an ongoing effort is underway to review and correct historical data, as needed.

## Audit Finding

### **3. Title 49 CFR §192.465 -External Corrosion Control: Monitoring**

*§192.465(d) requires the operator to take prompt remedial action to correct any deficiencies indicated by monitoring.*

- A. CPSD reviewed the cathodic protection records for the isolated sections of pipeline that were inspected in 2011 and noted that the locations listed in Attachment 4 did not have adequate pipe-to-soil potentials. The Region could not provide records demonstrating the corrective action taken for the isolated sections of pipeline that had inadequate pipe-to-soil potentials. Please review Attachment 4 and provide an update of the corrective actions taken for these locations, the current cathodic protection readings, and an explanation why there were no additional records available indicating the action taken by the Region for each location.
- B. During the audit, CPSD inspected the cathodic protection on the isolated section of pipeline located at 13875 Artesia Blvd in Downey, listed in Attachment 3. A pipe-to-soil read of -0.55V, which did not meet the -0.85V criteria, was obtained during the inspection. According to the Region's cathodic protection records, this location was to be inspected by 2011; however, the record in 2011 for this location was incomplete. Please advise CPSD the date this location was inspected in 2011 and the pipe-to-soil read taken. In addition, please describe the action taken by the Region to correct the cathodic protection at this location.

## Response

A) As shown in the spreadsheet, *Table for Finding 3A.xlsx*, included in Appendix A, 90 of the 204 locations listed in Attachment 4 are not CP10 facilities and as such, are not in violation with 49 CFR §192.465(a). Database updates are being processed to update these facility addresses.

Of the remaining 114 addresses that were inspected in 2011, timely corrective actions were taken with respect to 87 locations. Due to inadvertent clerical errors, however, the records reviewed by the auditors did not reflect the corrective actions previously taken:

- 65 were worked and brought up above minimum criteria with the installation of magnesium anodes (one with the installation of an insulating bushing). The follow-up reads demonstrating that each location was left above minimum criteria were not entered into service history. The re-reads performed in 2012 indicate that each of these services is above the minimum criteria levels.
- 22 were worked to clear a short and brought up above minimum criteria. The follow-up reads demonstrating that each location was left above minimum criteria were not entered into service history. The re-reads performed in 2012 indicate that each of these services is above the minimum criteria levels.

The remaining 27 locations were found to be inaccessible to the Technician during the 2011 read cycle. During this time period, a new work scheduling system was being implemented. As the Technicians worked each order in the new system, they were required to enter the time they began the job and time they ended the job on their new mobile data terminals. When the job's time-out data was entered, the software system assumed the jobs were completed and

closed them out without issuing a follow-up order. This was an unexpected result and was not immediately detected. Once this was discovered each impacted address was revisited to conduct follow-up inspection activities. The latest CP reads for each address, which are all above the minimum criteria, are shown in the spreadsheet provided. Additionally, the data shows that each of these service locations also was read above the minimum criteria in 2001.

#### Corrective Action

We revisited each of the identified addresses and a new CP10 inspection was performed. Each address currently exceeds minimum pipe-to-soil criteria. A new process has been implemented to monitor all CP10 inspections so they are not prematurely closed out before the required inspections are performed. We will also provide refresher training to our Technicians to remind them that all follow-up reads should be entered into the service history to prevent inadvertent data errors.

B) The address at 13875 Artesia Blvd was inspected in December 2012 and found to be in compliance, with a read of 1.4V, well above the minimum threshold criteria of 0.85V. The next inspection is due in 2022. Previously, in July 2012, we conducted a CP10 inspection and installed a magnesium anode at this location and a pipe-to-soil read was recorded as 1.4V, which is well above minimum criteria. Based on our review, it is unclear why this location was not identified for inspection prior to 2012.

#### Corrective Action

As noted above, the company is reviewing current procedures for service history data entry and processing to identify potential process and/or system improvements. Additionally, we instituted a new process change that sends newly-identified CP10 locations to the Region's Area Resource Scheduling Organization (ARSO) to be scheduled and worked.



## Audit Finding

### **4. Title 49 CFR §192.467 – External Corrosion Control: Electrical Isolation.**

*§192.467(b) ...One or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control.*

CPSD inspected the piping from the meter-set-assembly (MSA) at the Anaheim district base and determined that the MSA was not properly insulated from its anchor as required by Title 49 CFR §192.467(b). Please describe the action the Region engaged in to correct this violation.

## Response

This meter set is properly isolated per the requirements of 49 CFR 192.467(b). Therefore there is no violation.

49 CFR 192.467(b) requires the installation of insulating devices “where electrical isolation of a portion of pipeline is necessary to facilitate the application of corrosion control.” The piping identified by Staff does not require insulation per this code section. The support in question is located on an above-ground pipe segment located downstream of an insulating union separating it from the upstream cathodic protection system. This portion of the MSA is electrically isolated from the upstream piping so as not to interfere with the application of cathodic protection on the upstream CP system. As a result, the support does not impact the cathodic protection system in any way. Therefore, the insulation requirement in section 192.467(b) does not apply.

See photograph included in Appendix for as-found condition.

## Corrective Action

As we are in compliance with 49 CFR 192.467(b), there is no violation and no further action is required.

## Audit Finding

### **5. Title 49 CFR 192.491- Corrosion Control Records.**

*§192.491(a) ...Each operator shall maintain records or maps to show the location of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system.*

CPSD reviewed the map of Cathodic Protection Area (CPA), Package SL-C0864\_E\_C in Whittier, and noted that the map was not updated to reflect completion of Work Order #76805-005. The Work Order was completed on January 1, 2003; however, the Work Order and "Completion Sketch" attached to the map indicated the work was still under the proposal stage. Therefore, the Region was in violation Title 49 CFR, §192.491(a). Please explain why the map of CPA Package SL-C0864\_E\_C was not updated and the action the Region engaged in to correct the map.

#### Response:

The CP area package provided to the auditor contains the current CP area map (see attachments in Appendix A), which is up-to-date and identifies all cathodic protection components currently in the CP area, as required by §192.491(a). Therefore, the above mentioned records do not violate 49 CFR 192.491(a). The documents cited by CPSD as being in violation (Completion sketch and Work Order) are part of the historical source documents that reside in the CP area package. These reference documents often contain notes from Technicians to help them manage changes to the area.

#### Corrective Action

As our records comply with 49 CFR §192.491(a), there is no violation and no further action is required.

## Audit Finding

### **6. Title 49 CFR §192.707- Line Markers for Mains and Transmission Lines**

*§192.707(c) Pipeline aboveground...Line markers must be placed and maintained along each section of a main and transmission line that is located aboveground in an area accessible to the public.*

CPSD inspected regulator stations in Anaheim (Orangethorpe and Rose) and Fullerton (Raymer and Gilbert) and noted that there were no aboveground markers as required by Title 49 CFR §192.707(c). Please explain why the pipeline markers were missing and advise CPSD on the action taken by the Region to correct these violations.

## Response

The two identified regulator stations are fenced, barb-wired, and locked. As such, these areas are not accessible to the public. Accordingly, the above mentioned facilities do not violate 49 CFR 192.707(c), which expressly applies to facilities “accessible to the public.”

Our understanding of section 192.707(c) is consistent with PHMSA’s interpretation of the code provision. In Interpretation PI-76-079 (See Appendix A), the Acting Associate Director for Pipeline Safety Regulation of DOT/PHMSA states “The application of the regulation depends upon all factors relevant to whether an operator exercises physical control or whether an area is difficult to enter. These factors can only be ascertained by examination of the site. Two factors to consider are whether the area is adequately fenced and locked or guarded, and if not fenced, the remoteness of a facility from areas frequented by the public.”

Appendix A additionally shows photographs of the two District Regulator Stations (DRS), with signage.

## Corrective Action

Although there was no violation, we installed new signage at the two sites identified during the inspection.

## Audit Finding

### **7. Title 49 CFR §192.751 – Prevention of Accidental Ignition.**

*§192.751(c) Post warning signs, where appropriate.*

The regulator stations in Anaheim (Orangethorpe and Rose) and Fullerton (Raymer and Gilbert) also did not have safety or warning signs posted in the enclosures as required by Title 49 CFR §192.751(c). Please explain why the signs were missing and advise CPSD on the action taken by the Region to correct these violations.

## Response

In each of the identified locations there is no presence of gas constituting a hazard of fire or explosion and therefore, no safety or warning signs are required under 49 CFR 192.751(c). Therefore, the above mentioned stations are not in violation of 49 CFR 192.751, which provides:

Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:

(a) When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided.

(b) Gas or electric welding or cutting may not be performed on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work.

(c) Post warning signs, where appropriate. The District Regulator Stations at the locations identified above do not have regulator relief devices. Nor do the regulators vent to atmosphere. Therefore, under normal operating conditions, there is no “danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion” per 192.751.

Only when District regulator stations are being inspected for maintenance is there any potential venting to atmosphere of small amounts of gas. When this is done, safe practices are implemented, in accordance with section 192.751, to minimize the danger for accidental ignition and delineate the area to avoid impacting pedestrian or vehicular traffic. Additionally, our policies require that a fire extinguisher is readily available on-site during the inspection of these secured and fenced off facilities.

## Corrective Action

As the identified locations comply with applicable code provisions, there is no violation and no further action is required.

## Audit Finding

### **8. Title 49 CFR §192.805- Qualification Program**

*§192.805(b) ...Ensure through evaluation that individuals performing covered tasks are qualified;*

CPSD reviewed Work Order# 520000243821 and discovered that the individual performing the pipeline patrol (William Hitt) of pipeline 35\_6416 on January 5, 2012 in the Anaheim district was not qualified. SoCalGas performs a requalification of covered tasks every 5 years and William Hitt's qualification was not renewed in 2008. Please advise CPSD on the action taken by the Region to correct this violation.

## Response

On January 3, 2012, we dispatched a qualified employee to perform a pipeline patrol of the identified pipeline (Work Order #520000222982).

Two days later, on January 5, 2012, we dispatched a second employee, who was not qualified, to perform another pipeline patrol on the same segment of pipe (Work Order #520000243821). Our review indicates that this occurred because the dispatcher bypassed related system rules and assigned the second order to an unqualified Lead Construction Technician.

## Corrective Action

On July 10, 2012, we provided refresher training for all Dispatch employees at the Orange Coast Region office. They were all instructed on the purpose of rule warnings, the importance of reviewing the warnings, and what steps to take to correct potential errors. In addition, we are reviewing our dispatch rules and system to identify potential process and/or system enhancements.

## Audit Finding

### **9. Title 49 CFR §192.805 – Qualification Program**

*§192.805(f) ...Communicate changes that affect covered tasks to individuals performing those covered tasks;*

During record review, GSRB staff found inconsistencies in employees completing service orders for buried pipelines that are exposed. According to SoCalGas standard 186.02, this document was reviewed and revised in November 2010. Identifying buried pipelines that were exposed were to be marked with the revised condition code "L-1", instead of the old condition code "LR-1." However, the following service orders that were completed after the November 2010 revision still used the old condition code designation "L-1." Please advise CPSD on the action taken by the Region to correct this violation.

The following service work orders are itemized below:

Work Order#	Date	SoCalGas employee (last name)
#2063061	November 30, 2012	Rivera
#2053236	July 25, 2011	Hitt
#2043512	July 1, 2011	Baker

## Response

We have and follow a written qualification program, which includes a process for communicating changes that affect covered tasks to our employees, in compliance with section 192.805, which provides, in pertinent part:

Each operator shall have and follow a written qualification program. The program should include provision to:

... (f) Communicate changes that affect covered tasks to individuals performing those covered tasks. . . .

When we implement a change to a covered task, we distribute a Notice Of Publication (NOP) to all Gas Standard Recipients with revised/updated or new procedures. Changes that affect a covered task are reviewed with employees and documentation of the training attendees is entered on Form 5300 – Documentation of training. This form includes information pertaining to the training subject along with each employee's name and signature, acknowledging the training was completed.

The auditors identified two slightly different abbreviations used to document field observations for the condition of exposed steel pipe during excavation activities. For this particular data point, our field observers are required to rate the level of surface rust present on the pipe's exterior, with the choices being LR=Light Rust, MR = Medium Rust, and HR = Heavy Rust. The "1" indicates the level of pitting in the pipe wall. In this case the "1" indicates no pitting. Documentation of surface rust observations appear in a number of different field forms, each with an associated set of instructions or Gas Standards. For Gas Standard 186.02, the "R" was removed from the instructions and the rust classifications were shortened to L=Light Rust, M=Medium Rust, and H=Heavy Rust. While the abbreviations L and LR are not identical, it is understood that "LR" and "L" both mean the same thing, Light



Rust. As the abbreviations L and LR are not used to identify any other conditions, there is no other possible meaning for either abbreviation in this context.

#### Corrective Action

To eliminate the inconsistency identified by the auditors, Gas Standard 186.02 - *Cathodic Protection - Inspection of exposed pipe*, will be revised to reflect current practices and the "R" will be inserted back into the instructions. This discrepancy is administrative in nature, and in no way compromised the integrity of our pipeline system or our ability to assess its external corrosion conditions.

## Audit Finding

### **10. Recommendations and Concerns**

- A. CPSD noted that the MSA located at 14190 Firestone Blvd in Santa Fe Springs was susceptible to damage that could be caused by vehicular traffic. CPSD recommended that the MSA be protected by a barrier. Please provide an update on the status of this recommendation.
- B. CPSD noted in Attachment 4 that a cathodic protection inspection of the isolated section of pipeline at 14158 Firestone Blvd in Santa Fe Springs was conducted by the Region on May 3, 2011. CPSD visited this location and discovered that there were no gas facilities present. Please explain why there were no gas facilities present at this location.

## Response

- A. Although there are no parking spaces delineated at this location and alignment with the garage door does not put vehicles in the path of the MSA, we installed a guard post to protect the MSA at this location.
- B) During the audit, the auditor and Gas Company employees were unable to locate the service and none was found. On January 7, 2013, we revisited the location and observed that the service was hidden by bushes near the building. On that day, we took a reading of 1.26V, well above minimum criteria. We have since painted this service yellow and added markings to the curb to facilitate inspection of this service during future visits.

## Appendix A

### Documents supporting response to Finding #3

Attachment containing responses to CPSD attachment #4 table



Table for Finding 3A  
1-8-13.xlsx

### Documents supporting response to Finding #4

The photograph below represents the condition of the MSA in question at the time of the audit.



### Documents supporting response to Finding #5



West Side of Area  
Map.JPG



East Side of Area  
Map.JPG



Back Side of Area  
Map.JPG

### Documents supporting response to Finding #6

PHMSA Interpretation #PI-76-079 - DOT interpretation to 49 CFR §192.707- Line Markers for Mains and Transmission Lines. The pdf version is attached below, the online version can be found at: <http://www.phmsa.dot.gov/pipeline/regs/interps>



Finding #6  
PI76079.pdf



Orangethorpe and Rose DRS, the day after CPUC inspection.



Orangethorpe and Rose DRS - Shows recent fence replacement and signage





Raymer and Gilbert DRS, the day after the CPUC inspection